



Portland, ME

Augusta, ME

Concord, NH

Boston, MA

Washington, DC

Jeffrey D. Talbert  
jtalbert@preti.com  
207.791.3239

February 11, 2022

**VIA ECF**

Honorable Leda Dunn Wettre, U.S.M.J.  
U.S. District Court, District of New Jersey  
MLK Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**RE: *Occidental Chemical Corp. v. 21st Century Fox America, Inc., et al.*,  
Civil Action No. 2:18-cv-11273-MCA-LDW**

Dear Judge Wettre:

I write on behalf of the Defendants in the Small Parties Group (“SPG”) to provide the Court with an important update regarding the status of settlement discussions between Defendants and the United States. A significant number of Defendants have now reached an agreement in principle with the United States. Because entry of this settlement should effectively end this litigation for all parties, the Court should grant the Moving Parties’ motion for a stay of proceedings and leave to file the motion (ECF No. 1943) to allow the parties to complete this agreement.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Talbert', with a long horizontal flourish extending to the right.

Jeffrey D. Talbert

cc: All Counsel (via ECF)  
Thomas Scrivo, Special Master (via E-Mail)